NO. 95109-8

SUPREME COURT OF THE STATE OF WASHINGTON

HEALTH PROS NORTHWEST, INC.,

Appellant/Cross-Respondent,

v.

STATE OF WASHINGTON et al.,

Respondent/Cross-Appellant.

THE DEPARTMENT OF CORRECTIONS' REPLY BRIEF ON CROSS APPEAL

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TABLE OF CONTENTS

TABLE OF AUTHORITIES

Cases

Statutes

Other Authorities

Regulations

I. INTRODUCTION

An agency can appropriately respond to a Public Records Act (PRA) request in a number of different ways. *See Belenski v. Jefferson Cnty.*, 186 Wn.2d 452, 460-61, 378 P.3d 176 (2016) (recognizing there are multiple ways for an agency to respond beyond those specifically identified in RCW 42.56.550(6)). Regardless of how an agency eventually responds to a request, every agency must respond to a request within five business days of receiving the request by doing one of five things. RCW 42.56.520(1)(a)-(e). In recognition that an agency may not have a complete picture of a request or its response within five business days, one of the five options allows an agency to acknowledge a request and provide a reasonable estimate of time of when it will respond further to the request. *See* RCW 42.56.520(1)(c); *Resident Action Council v. Seattle Hous. Auth.*, 177 Wn.2d 417, 432, 327 P.3d 600 (2013) (recognizing that this provision allows an agency to "notify requester it needs a reasonable amount of time to determine appropriate further response"). Meanwhile, a requester can seek review of the agency's estimate by filing an action in a superior court to require the agency to justify the reasonableness of its estimate.

In this case, the Department timely acknowledged Health Pros Northwest's (HPNW) three-page public records request within five

business days and informed HPNW that it would respond further by a certain date. This initial response met the requirements of RCW 42.56.520(1)(c). In concluding that this response violated the PRA, the trial court took an unduly narrow view of the word "respond" by concluding that RCW 42.56.520(1)(c) requires an agency to provide an estimate of time by which it will produce a first installment of records. This interpretation ignores the plain meaning of the word "respond" and ignores that there are multiple ways under the PRA for agencies to appropriately respond to requests besides producing records. Because the Department's five-day letter provided a reasonable estimate of when it would respond further to HPNW's request, the trial court erred in concluding that the Department's five-day letter violated the PRA.

II. ARGUMENT

A. The Trial Court and HPNW Misconstrue the *Hobbs* Decision and the Plain Meaning of "Respond" by Failing to Recognize That an Agency Can Appropriately Respond to a PRA Request in Many Different Ways

RCW 42.56.520(1)(c) allows an agency to acknowledge a request and provide "a reasonable estimate of the time the agency...will require to respond" within five business days of receiving the request. RCW 42.56.520(1)(c). The estimate-of-time language should be interpreted in light of the many different ways that an agency can potentially respond to

a request. Specifically, an agency can respond by denying records, producing records in a single production, producing records in installments, or informing the requester that no responsive records have been found after conducting an adequate search for such records. There are many legitimate reasons that an agency may not be able to complete its response within five business days, including a need to gather records, to notify third parties affected by the request, to determine whether the records contain exempt information, or to ensure that it is responding diligently to other public records requests that the agency has received. CP 115; RCW 42.56.520(2). Under RCW 42.56.520(1)(c), an agency that needs more than five business days to respond to a request must provide the requester a reasonable estimate of when the agency will respond to the request. *See Resident Action Council*, 177 Wn.2d at 432. The Department did so when it acknowledged HPNW's request within five business days and informed HPNW that it would respond further to the request within forty-five business days. CP 146-48.

The trial court found that the Department violated the PRA because it erroneously concluded that RCW 42.56.520(1)(c) requires an agency to provide an estimate to the requester of when it will produce the first installment of records. The trial court based its decision on its interpretation of *Hobbs v. State*, 183 Wn. App. 925, 335 P.3d 1004

(2014).[1] However, the trial court's interpretation of both *Hobbs* and the statutory language is unduly narrow and ignores that there are many ways for an agency to appropriately and reasonably respond to a public records request.

In *Hobbs*, an agency acknowledged a public records request within five business days and informed the requester of when it expected the first records installment to be available for inspection. *Hobbs*, 183 Wn. App. at 929. The requester filed a lawsuit shortly after receiving the first installment. *Id.* at 932. Like HPNW in this case, the requester argued that the agency violated the PRA by failing to provide an estimated date of when the agency would complete the request. *Id.* at 941. The Court of Appeals rejected that argument. *Id.* at 943. The *Hobbs* court recognized that the PRA allows an agency to respond in multiple ways and concluded that requiring an agency to estimate when it would respond fully would add words to the plain language of the statute. *Id.* at 940-43. The court concluded that RCW 42.56.520(1)(c)[2] required an agency to provide a reasonable estimate of time required to respond to the request and that the

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[1] In the trial court's oral ruling that the Department violated the PRA, the trial court did not mention *Hobbs v. State*, 183 Wn. App. 925, 335 P.3d 1004 (2014). Instead, it relied upon a portion of the Model Rules of the Attorney General's Office that has since been changed and upon *Hikel v. City of Lynwood*, 197 Wn. App. 366, 389 P.3d 677 (2016). RP 26. The language about *Hobbs* was inserted into the final written order drafted by HPNW's counsel.

[2] At the time of the *Hobbs* decision, the provision in question was RCW 42.56.520(3). It was amended and became RCW 42.56.520(1)(c) in 2017. Laws of 2017, ch. 303, § 3.

agency met that requirement by providing an estimated date by which it would provide a first installment. *Id.* at 942. The *Hobbs* court, however, did not say that such a response was the only way to comply with the reasonable estimate provision in RCW 42.56.520(1)(c). In other words, *Hobbs* concluded that an estimate of when the first installment would be available was sufficient to comply with RCW 42.56.520(1)(c), but it did not state that such a response was necessary to comply with that section. Indeed, the *Hobbs* court explicitly recognized that an agency can appropriately respond to a PRA request in a number of ways. *Id.* at 942. The Court of Appeals in *Hobbs* was not confronted with and did not discuss a situation in which an agency acknowledged a request and provided a reasonable estimate of when the agency would respond further to the request. The trial court's conclusion to the contrary was based on an unduly narrow and illogical reading of *Hobbs*.

Furthermore, the plain language of RCW 42.56.520(1)(c) does not require a reasonable estimate of when the agency will produce a first installment of records. As discussed above, an agency can respond to a public records request in many ways, including (1) notifying the requester that there are no responsive records after conducting a reasonable search, (2) informing the requester that there are responsive records but the records are exempt from production under a statutory exemption,

(3) providing the records in a single production, or (4) providing records in installments. Indeed, RCW 42.56.520(2) explicitly acknowledges that agencies may need additional time to respond to requests for a number of reasons. Under the trial court's view of *Hobbs* and RCW 42.56.520(1)(c), a reasonable estimate of time that the agency will require to respond is equivalent to an estimate of the time when the agency will produce the first installment of records. This presumes, however, that the only response to a public records requests is to provide an installment of records. But as discussed above, there are a number of ways to respond to requests and the trial court's interpretation ignores the potential other ways that agencies can appropriately respond to such requests.

In this case, the Department's five-day letter complied with RCW 42.56.520(1)(c). The Department acknowledged the request in writing and provided a reasonable estimate of the time by which it would respond further to the request. CP 146-48. In other words, the Department's initial five-day letter used the precise term, i.e., "respond," that the legislature used in RCW 42.56.520(1)(c) when it described the agency's obligation to provide a reasonable estimate. The trial court erred in concluding that such a response violated the PRA.

In response, HPNW advances a number of arguments about the plain language of the statute and *Hobbs*. None are availing. First, HPNW

suggests that the Department has conceded that the plain language does not support its interpretation by resorting to the technical meaning of the word "respond." HPNW's Reply, at 17. The Department, however, has not so conceded. Rather, the Department has argued that the plain dictionary definition of the word "respond" and the word "respond" as used in the PRA both support the Department's interpretation of RCW 42.56.520(1)(c). They do.

Second, it is HPNW's argument that the word "respond" is the equivalent to "fully respond" that is contrary to the plain meaning of the word "respond." One way to illustrate why HPNW's interpretative gloss is inconsistent with the plain meaning of the word "respond" is to ask this question: Has the Department responded to HPNW's request? The answer to that question is that it clearly has. But if someone wanted to know if the Department has completed its response to HPNW's request, then that person would need to ask a different question. Specifically, a person would need to ask if the Department has completed or fully responded to the request. This highlights how HPNW's attempt to equate "fully respond" and "respond" is inconsistent with the common, everyday use of the word "respond."

Additionally, HPNW's interpretation and the trial court's interpretation are inconsistent with the manner in which the word

"respond" is used elsewhere in the same statutory provision. When the same word is used in a statutory provision, courts treat that word to have the same meaning throughout the statute. *See, e.g.*, *Welch v. Southland Corp.*, 134 Wn.2d 629, 636, 952 P.2d 162 (1998); *Cowles Publ'g Co. v. State Patrol*, 109 Wn.2d 712, 722, 748 P.2d 597 (1988). RCW 42.56.520 uses the word "respond" in multiple places. However, the statute would not make sense if the Court used either HPNW's or the trial court's interpretation of the word "respond" throughout RCW 42.56.520. HPNW posits that "respond" means "fully respond"; the trial court concluded that respond meant "produce a first installment." If such words were substituted into the statute, it would read as follows:

> (1) Responses to requests for public records shall be made promptly by agencies...Within five business days of receiving a public record request, an agency...must **[fully respond] or [produce a first installment]** in one of the ways provided in this subsection (1):
> (c) Acknowledging that the agency...has received the request and providing a reasonable estimate of the time the agency...will require to **[fully respond] or [produce a first installment]** to the request;

RCW 42.56.520 (emphasis added). This interpretation would make little sense because such language would seem to suggest that agencies are required to fully respond to all requests within five business days (HPNW's interpretation) or produce a first installment of records within five business days (the trial court's interpretation). Therefore, in order to

accept either HPNW's argument or the trial court's interpretation, the Court would have to conclude that the legislature used the word "respond" in two different ways in the same statutory provision. But this would conflict with the well-established principle that the same words in the same statutory provision should be given the same meaning. In contrast, interpreting "respond" in light of the various ways that agencies can appropriately respond to a public records request—as the Department argues it should be interpreted—would allow the word "respond" to have the same meaning throughout the statute. As such, the plain language of the statute does not support HPNW's or the trial court's interpretation of RCW 42.56.520(1)(c).

B. Settled Precedent Does Not Support HPNW's Interpretation of RCW 42.56.520(1)(c)

HPNW argues that courts and agencies have consistently applied the interpretation of RCW 42.56.520(1)(c) for which HPNW advocates prior to *Hobbs*. Specifically, HPNW argues that HPNW's interpretation of the statute is "exactly how courts, legal authorities, and agencies utilizing the Act have consistently construed and applied it for the first 38 years of the Public Records Act's existence." HPNW's Reply, at 10. This is incorrect.

First, HPNW's contention is not supported by any studies of the practice of other agencies or any factual evidence at all. Instead, this statement appears to be based on the date that the PRA[3] was enacted by a citizen's initiative. However, this argument ignores the fact that the five-day response requirement was not even part of the original PRA enacted by public initiative. Instead, that requirement was added much later by the legislature in 1992. Laws of 1992, ch. 139, § 6.

Second, HPNW erroneously claims that the Department did not cite any authority for its interpretation of the PRA. In the very first line of the Department's brief, the Department cited one of the only decisions by this Court to refer to RCW 42.56.520(1)(c), *Resident Action Council v. Seattle Housing Authority*, 177 Wn.2d 417, 327 P.3d 600 (2013). Department's Opening Brief, at 1. In that case, this Court referred to RCW 42.56.520(1)(c) as allowing an agency to notify the requester that the agency "needs a reasonable amount of time to determine [an] appropriate further response." 177 Wn.2d at 432. This meaning of RCW 42.56.520(1)(c) appears consistent with this Court's other decisions that discuss RCW 42.56.520. *See Belenski v. Jefferson Cnty.*, 186 Wn.2d 452, 456-57, 378 P.3d 176 (2016) (indicating that one of the ways that an agency can respond to a request is to "ask for more time"). Therefore, this

[3] The PRA was known as the Public Disclosure Act (PDA) when first enacted. The Department refers to the Act as the PRA for purposes of consistency.

Court's decisions—as well as *Hikel v. City of Lynwood*, 197 Wn. App. 366, 389 P.3d 677 (2016) and *Hobbs v. State*, 183 Wn. App. 925, 335 P.3d 1004 (2014)—support the Department's interpretation of the statute.

In support of its argument that prior case law adopted its interpretation of the statute, HPNW cites *West v. Washington State Department of Natural Resources*, 163 Wn. App. 235, 258 P.3d 78 (2011), and *Doe I v. Washington State Patrol*, 80 Wn. App. 296, 908 P.2d 914 (1996). Neither of these cases support the proposition that courts had previously viewed the reasonable estimate requirement differently than the *Hobbs* court because both cases involved a complete failure by the agency to even acknowledge the request within five business days. *West*, 163 Wn. App. at 243; *Doe I*, 80 Wn. App. at 303.

In *West*, the agency had responded to the request on the eleventh day and the sufficiency of that response did not appear to be at issue. *West*, 163 Wn. App. at 243. The Court of Appeals, however, concluded that an agency must respond within five business days and violates the PRA when it fails to do so. *Id.* at 244. The *West* court did not adopt or analyze the estimate-of-time requirement and it certainly did not find that the agency violated the PRA for failing to provide an estimate of when it would fully respond to the request.

Similarly, in *Doe I v. Washington State Patrol*, 80 Wn. App. 296, 908 P.2d 914 (1991), the agency did not respond at all within five business days of receiving the request. *Doe I*, 80 Wn. App. at 303. The Court of Appeals again concluded that this violated the PRA because an agency was required to do one of the things identified in 42.56.520.[4] *Id.* at 304. The Court of Appeals identified one of the options as "acknowledging the request and providing an estimate of when [the agency] would respond." Like the *West* court, the court in *Doe I* was dealing with the situation in which the agency had completely failed to respond to the request and the court did not indicate that an agency must provide an estimate of when it would fully respond. Therefore, HPNW's contention that *Hobbs* somehow overturned the manner in which courts had interpreted RCW 42.56.520(1)(c) for 38 years is simply incorrect.

As supposed further support for HPNW's argument that *Hobbs* changed 38 years of consistent interpretation of RCW 42.56.520(1)(c), HPNW relies upon a Deskbook guide that was published by the Washington State Bar Association only months before the *Hobbs* decision, and a prior version of the Attorney General's Office's Model Rules. The edition of the WSBA's Public Records Deskbook cited by HPNW was

[4] This statutory provision was formerly RCW 42.17.320.

published sometime after July 2014.[5] Washington State Bar Association, *Public Records Act Deskbook: Washington's Public Disclosure and Open Public Meetings Law* (2d ed. 2014). Furthermore, this guide for practitioners obviously does not bind this Court in interpreting RCW 42.56.520, and the Deskbook does not cite any legal authority for its statements about the requirements of RCW 42.56.520(1)(c). However, it is important to note that the Deskbook itself is somewhat equivocal in what the reasonable-estimate-of-time requirement entails. *Compare* WSBA, *Public Records Act Deskbook* 6-22 (indicating that in some circumstances agencies may not be required to provide an exact date as part of the estimate but "some time range should be included"), *with* WSBA, *Public Records Act Deskbook* 6-22 (indicating that a reasonable estimate should include two estimates, one for the first installment and one estimate of when the request will be completed). Thus, this guide for practitioners—published months before *Hobbs*—does not establish that this provision of the PRA had been consistently interpreted in the manner HPNW's proposes.

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[5] The exact date of the Deskbook's publication is unclear. However, the Deskbook mentions this Court's decision in *Hundtofte v. Encarnacion*, 181 Wn.2d 1, 330 P.3d 168 (2014). WSBA, *Public Records Act Deskbook*, 21-5. That case was decided on July 24, 2014. *Hundtofte*, 181 Wn.2d at 1. *Hobbs* was decided on October 7, 2014. *Hobbs*, 183 Wn. App. at 925.

HPNW finally relies upon the Attorney General's Office's Model Rules. The portion of Model Rules cited by HPNW, however, was not adopted 38 years ago but in 2005. Furthermore, as the Department pointed out in its opening brief, Department's Opening Brief, at 26-27, the Model Rules are not binding on an agency and does not bind this Court. To the extent that the Model Rules are or could be persuasive authority, the current version of the Model Rules supports the Department's position, not HPNW's position, because the Model Rules have recently been amended. Specifically, the Model Rules now state in the relevant part that an agency complies with the five-day response requirement by "acknowled[ing] that the agency has received the request and provid[ing] a reasonable estimate of the time it will require to further respond." WAC 44-14-04003(4).

Finally, it is actually HPNW's proposed interpretation that would significantly upset the settled expectations of public agencies and requesters. Prior to the Department's receipt of HPNW's request, the Court of Appeals decisions were universal in deciding that an agency did not need to provide an estimated date of completing the request. *See Hikel v. City of Lynnwood*, 197 Wn. App. 366, 375-76, 389 P.3d 677 (2016); *Hobbs v. State*, 183 Wn. App. 925, 941-42, 335 P.3d 1004 (2014). The trial court appropriately followed those appellate decisions. Now, having

prevailed on its argument that the agency violated the PRA in its five-day letter and recovered attorney's fees for that violation, HPNW has appealed that favorable decision, asks this Court to overturn the prior Court of Appeals decisions, and then retroactively punish the Department with an additional award of attorney's fees against it based on this newly established law. In doing so, the Court would not only be effectively penalizing the Department retroactively for this change in the law but it would also be opening public agencies who have relied upon the *Hobbs* and *Hikel* decisions to liability for simply following appellate court decisions in good faith. This Court should reject such an invitation.

C. The Department's Interpretation Does Not Allow an Agency to Indefinitely Postpone Responding to a PRA Request

HPNW strenuously claims that the Department's interpretation of the statute is inconsistent with the purpose of the PRA and allows an agency to spin "a spider's web in which a records requester can find his or her request endlessly entangled." HPNW's Reply Brief, at 19. HPNW also suggests that the Department's proposed interpretation would create some jurisdictional gap and simply serves the convenience of agencies. None of these conclusory and hyperbolic statements is sufficiently explained and none of them is supported by the actual facts of this case.

First, the Department acknowledged below and has reiterated its position before this Court that requesters have the option to go to court to seek review of the reasonableness of the agency's estimate throughout the request. Indeed, the trial court did exactly that when it reviewed the entirety of the Department's response up until the date of the hearing. CP 249. In its unchallenged findings of fact, the trial court found that the Department was responding reasonably to HPNW's request. CP 249. Given the constant possibility that the timeliness of an agency's response can be reviewed at any time, RCW 42.56.550(2), it is difficult to see how a requester could be endlessly entangled in the agency's response. Because agencies will face the specter of a requester challenging the timeliness of its response until the agency has completed the request, there is no incentive for an agency to indefinitely postpone its response to a request or to slow walk the response.

Contrary to HPNW's argument, the Department's approach does not merely serve the convenience of the agency. Instead, it recognizes the practical realities that agencies face and the goal of the PRA to require agencies to diligently and reasonably respond to requests without unnecessarily interfering with the agency's other essential functions. Agencies like the Department have other functions beyond responding to public records requests and these agencies also have other public records

requests to which they must respond. The practical reality is that some agencies—for a variety of legitimate reasons—may not know what its response to a given request may be within five business days. The agency may need to search to determine if there are responsive records, it may need to review the records to determine if they are exempt from production, and it may need to notify a third-party that it plans on releasing records. *See* CP 115 (explaining why the Department may need additional time to respond to a request); CP 127 (explaining why the Department needed more time than five days to respond to HPNW's request). In recognition of the possibility that such additional time will be needed, the legislature specifically provided an agency a mechanism to take such time while requiring the agency to respond to the request within a reasonable timeframe and communicate with the requester about the progress of the request. RCW 42.56.520(1)(c) & (2). Again, a court can always review such a response to ensure that the agency is responding reasonably to a request. RCW 42.56.550(2).

Furthermore, HPNW's arguments completely ignore the facts of this case. Contrary to HPNW's assertion that the Department has been dragging its feet on HPNW's request, the Department has been responding diligently and reasonably to HPNW's request. CP 249. The Department has been providing regular installments to HPNW. CP 131-134.

Additionally, the Department has offered HPNW the opportunity to prioritize its public records request and HPNW has declined that offer. CP 133. Such conduct is consistent with both the spirit and the plain language of the PRA.

Instead of discussing the entirety of the Department's reasonable and diligent response, HPNW attempts to rewrite the history of the request and this litigation. HPNW claims that it needed to file this action because it was "upset with the pace at which the agency was producing responsive documents." HPNW's Reply Brief, at 2. However, HPNW submitted a broad, three-page request to the Department. CP 121-24. The Department acknowledged the request, began immediately working on the request, and notified HPNW when it would respond further to the request. CP 116, 126-29. Approximately eight weeks later, the Department made a first installment of 695 pages of records available to HPNW. CP 129. HPNW then filed this action only a couple of weeks after the Department produced its first installment of records. CP 4. Even after HPNW filed this lawsuit shortly after receiving the first installment, the Department has continued to produce records on a regular basis, including over 15,000 pages of records by the time of the hearing in the trial court. CP 247. Such conduct does not defeat the purpose of the PRA and does not represent a circumstance where an agency is indefinitely postponing its obligations

under the PRA. Nor was the Department's pace at producing records in this case so slow that HPNW was required to file a lawsuit to receive a timely response.

HPNW's argument amounts to a complaint that the Department has been unable to immediately produce all responsive records to its three-page public records request. This argument ignores, however, that the Department has other requests that it must also respond to in a reasonable manner. The Legislature has recognized that an agency cannot drop everything else to address a single broad public records request. *See* RCW 42.56.100 (authorizing agencies to adopt and enforce reasonable regulations to prevent excessive interference with agency functions); RCW 42.56.520(2) (allowing agencies additional time to respond to requests). Agencies, including the Department must take care to treat all requesters fairly, and they cannot focus solely on one large request at the expense of delaying responses to other requesters. The Court should not interpret the PRA to require such a result. Therefore, the Department's interpretation does not undermine the PRA.[6]

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[6] HPNW also argues that the Department is producing records in a manner that the records would no longer be meaningful to it. HPNW's Reply Brief, at 15. However, HPNW has never indicated why it needs the large amount of records that it is seeking.

III. CONCLUSION

For the above stated reasons, the Department respectfully requests that the Court reverse the trial court's conclusion that the Department violated the PRA and the trial court's award of costs and attorney's fees. The Court should affirm in all other respects and remand for the trial court to dismiss HPNW's claims with prejudice.

RESPECTFULLY SUBMITTED this 1st day of May, 2018.

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I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 1st day of May, 2018, at Olympia, Washington.

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